

# **Exhibit B**

**From:** Lee, Chris (TR General Counsel)  
**To:** JMurdica  
**Cc:** Liz.Achtemeier@BeasleyAllen.com; gmgordon@jonesday.com; Brittany.Scott; Ted.Meadows; Leigh.O'Dell  
**Subject:** RE: [EXTERNAL] RE: [EXT] date for 3rd bankruptcy -JNJ / LTL  
**Date:** Wednesday, May 15, 2024 2:26:34 PM  
**Attachments:** image001.png  
image002.png  
image004.png

Caution: This email originated from outside the Firm.

Jim: Your emails were forwarded to me in my capacity as in-house legal counsel for Reuters. Beasley Allen does not represent Brendan Pierson, and we have seen no evidence to suggest that Beasley Allen represents Reuters or Thomson Reuters. Further, we respectfully disagree that Reuters has acted, or is “again preparing to act,” as “plaintiffs counsel’s mouthpiece.”

This message is not a full recitation of the facts related to this matter and is without prejudice to Reuters’ rights, claims, and defenses, all of which are expressly reserved.

Best regards,

Chris

**Chris Lee**  
Associate General Counsel, Reuters News

Thomson Reuters

[christopher.lee@tr.com](mailto:christopher.lee@tr.com)  
[thomsonreuters.com](https://thomsonreuters.com)

**From:** Murdica, James <[JMurdica@btlaw.com](mailto:JMurdica@btlaw.com)>  
**Sent:** Wednesday, May 15, 2024 10:54 AM  
**To:** Liz Achtemeier <[Liz.Achtemeier@beasleyallen.com](mailto:Liz.Achtemeier@beasleyallen.com)>  
**Cc:** JKim8@its.jnj.com; gmgordon@jonesday.com; Brittany.Scott <[Brittany.Scott@beasleyallen.com](mailto:Brittany.Scott@beasleyallen.com)>; Ted Meadows <[Ted.Meadows@beasleyallen.com](mailto:Ted.Meadows@beasleyallen.com)>; Leigh O'Dell <[Leigh.ODell@beasleyallen.com](mailto:Leigh.ODell@beasleyallen.com)>; Pierson, Brendan (Reuters) <[Brendan.Pierson@thomsonreuters.com](mailto:Brendan.Pierson@thomsonreuters.com)>  
**Subject:** Re: [EXTERNAL] RE: [EXT] date for 3rd bankruptcy -JNJ / LTL

Ms. Achtemeier-  
As you well know, including a third party on an allegedly privileged communication abrogates that privilege. Please confirm that Thomson-Reuters is a client of Beasley Allen.  
Brendan Pierson: please confirm that you and the Beasley Allen law firm are in an attorney-client relationship.  
Thanks,  
Jim

On May 15, 2024, at 9:57 AM, Liz Achtemeier <[Liz.Achtemeier@beasleyallen.com](mailto:Liz.Achtemeier@beasleyallen.com)> wrote:

Caution: This email originated from outside the Firm.

Mr. Murdica,

Ms. [REDACTED] is represented in this matter by Beasley Allen. As you know, it is not permissible for you to communicate directly with a represented individual.

**Elizabeth Achtemeier**  
Principal  
334.269.2343

**From:** Murdica, James <[JMurdica@btlaw.com](mailto:JMurdica@btlaw.com)>  
**Sent:** Tuesday, May 14, 2024 5:54 PM  
**To:** Liz Achtemeier <[Liz.Achtemeier@BeasleyAllen.com](mailto:Liz.Achtemeier@BeasleyAllen.com)>; jkim8@its.jnj.com; gmgordon@jonesday.com; brendan.pierson@thomsonreuters.com; [REDACTED]  
**Cc:** Brittany Scott <[Brittany.Scott@BeasleyAllen.com](mailto:Brittany.Scott@BeasleyAllen.com)>; Ted Meadows <[Ted.Meadows@BeasleyAllen.com](mailto:Ted.Meadows@BeasleyAllen.com)>; Leigh O'Dell <[Leigh.ODell@BeasleyAllen.com](mailto:Leigh.ODell@BeasleyAllen.com)>  
**Subject:** RE: [EXT] date for 3rd bankruptcy -JNJ / LTL

[EXTERNAL]

It appears from the disclosure that Beasley Allen again is seeking to enter into a surreptitious relationship to thwart a bankruptcy resolution—and Reuters is again preparing to act as plaintiffs counsel’s mouthpiece—by publishing misleading and deceptive advertising, which raises a panoply of issues that may fall within the crime/fraud exception to the attorney-client privileged. We ask that Beasley Allen explain the nature of the relationship and communication with Reuters (and a self-proclaimed media “influencer”) that it asserts gives rise to its privilege assertion. Also, we’ve added back the original recipients that you deleted, and ask Brendan Pierson and [REDACTED] confirm that they are in a privileged attorney-client relationship with Beasley Allen.

Jim

**James Murdica** | Partner  
Barnes & Thornburg LLP  
One North Wacker Drive Suite 4400, Chicago, IL 60606  
Direct: (312) 214-4869 | Mobile: (215) 341-6996



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**From:** Liz Achtemeier <[Liz.Achtemeier@BeasleyAllen.com](mailto:Liz.Achtemeier@BeasleyAllen.com)>

**Sent:** Tuesday, May 14, 2024 1:54 PM

**To:** [jkim8@its.jnj.com](mailto:jkim8@its.jnj.com); [gmgordon@jonesday.com](mailto:gmgordon@jonesday.com); Murdica, James <[JMurdica@btlaw.com](mailto:JMurdica@btlaw.com)>

**Cc:** Brittany Scott <[Brittany.Scott@BeasleyAllen.com](mailto:Brittany.Scott@BeasleyAllen.com)>; Ted Meadows <[Ted.Meadows@BeasleyAllen.com](mailto:Ted.Meadows@BeasleyAllen.com)>; Leigh O'Dell <[Leigh.ODell@BeasleyAllen.com](mailto:Leigh.ODell@BeasleyAllen.com)>

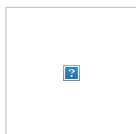
**Subject:** [EXTERNAL] RE: [EXT] date for 3rd bankruptcy -JNJ / LTL

**Caution: This email originated from outside the Firm.**

Counsel,

Please disregard the below attorney-client communication.

Thank you,



**Elizabeth Achtemeier**

Principal  
800.898.2034

[Liz.Achtemeier@BeasleyAllen.com](mailto:Liz.Achtemeier@BeasleyAllen.com)  
[BeasleyAllen.com](https://www.beasleyallen.com) | [My bio](#)

[Learn more about our ongoing litigation.](#)



[CONFIDENTIALITY & PRIVILEGE NOTICE](#)

**From:** [REDACTED]

**Sent:** Tuesday, May 14, 2024 11:43 AM

**To:** Brittany Scott <[Brittany.Scott@BeasleyAllen.com](mailto:Brittany.Scott@BeasleyAllen.com)>; [jkim8@its.jnj.com](mailto:jkim8@its.jnj.com); [gmgordon@jonesday.com](mailto:gmgordon@jonesday.com); [jmurdica@btlaw.com](mailto:jmurdica@btlaw.com)

**Cc:** [brendan.pierson@thomsonreuters.com](mailto:brendan.pierson@thomsonreuters.com)

**Subject:** [EXT] date for 3rd bankruptcy -JNJ / LTL

**[EXTERNAL]**

Brit,

Got your email yesterday with the update.

Please do me a favor and let me know the exact date they plan to issue paperwork for the 3rd bankruptcy

or John, or Greg or James, you can tell me directly. You can text as well 215-853-7846

Thanks,  
D

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